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Patent  
&  
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April 16, 2007

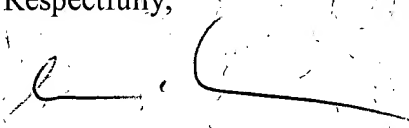
Mail Stop Appeal Brief - Patents  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Re: **Application Serial No.:** 09/611,463  
**Confirmation No.:** 6431  
**Applicants:** Amdur, et al.  
**Title:** Computer System Security Service  
**Docket No.:** DSC-002

Sir:

Please find enclosed Appellants' second Reply Brief pursuant to 37 C.F.R. § 41.41 in response to the two substitute Examiner's Answers dated February 16, 2007 and March 1, 2007, for filing in the above-referenced application.

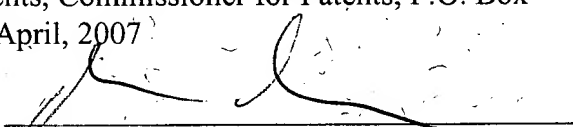
Respectfully,

  
Christopher L. Parmelee  
Reg. No. 42,980

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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

In Re Application of:	)	
<b>Eugene Amdur, et al.</b>	)	
	)	Art Unit <b>2134</b>
Serial No.: <b>09/611,463</b>	)	
	)	
Confirm. No.: <b>6431</b>	)	
	)	
Filed: <b>July 7, 2000</b>	)	Primary Examiner
	)	<b>Ellen C. Tran</b>
For: <b>Computer System Security</b>	)	
<b>Service</b>	)	

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**REPLY BRIEF PURSUANT TO 37 C.F.R. § 41.41**

Sir:

The Office has issued two substitute Examiner's Answers dated February 16, 2007 and March 1, 2007. These Examiner's Answers appear to include the identical arguments presented in the original Examiner's Answer dated June 2, 2006. It is unclear why two identical substitute Examiner's Answers have been issued.

Applicants desire the Appeal to continue and hereby resubmit their Reply Brief pursuant to 37 C.F.R. § 41.41 concerning the above-referenced Application. This Reply Brief is in response to these Examiner's Answers (referred to collectively as "the Answer"). Page numbers of the Answer referenced herein are with respect to the Answer dated March 1, 2007.

## **STATUS OF CLAIMS**

Claims 1-13 are pending in the Application.

Claims rejected: 5-11

Claims allowed: none

Claims confirmed: none

Claims withdrawn: 1-4, 12, and 13

Claims objected to: none

Claims canceled: none

Appellants appeal the rejections of claims 5-11. These claim rejections were the only claim rejections present in the Office Action ("Action") dated September 28, 2005, which was final.

**(vi) GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL**

The grounds to be reviewed in this appeal are:

Whether Appellants' claims 5-11 are unpatentable under 35 U.S.C. § 102(e) over Schneider, et al., U.S. Patent No. 6,178,505 ("Schneider").

## **ARGUMENT**

Appellants' Appeal Brief filed on February 21, 2006 is incorporated herein by reference. The following reply is directed to the Answer. However, even though the present reply has been organized in a manner which addresses issues and arguments presented in the Answer, Appellants do not waive their right to have all of their separately argued claims in the Appeal Brief be considered independently of each other by the Board. If the Board has an unwritten policy which considers the format of the present Reply Brief to be a waiver of Appellants' right to have each separately argued claim in the Appeal Brief be independently considered by the Board, then Appellants respectfully request that the Board so notify Appellants and provide an opportunity for Appellants to submit a revised Reply Brief.

### **Response to Arguments in Examiner's Answer**

The Answer includes a "(9) Grounds of Rejection" section beginning on page 4. All of the grounds of rejection included in this section of the Answer are substantially similar to those previously presented in the Office Action dated September 28, 2005. Therefore, please refer to Appellants' previous arguments in the Appeal Brief regarding all the issues of record.

In addition to the grounds previously presented, the Answer has expanded the page and/or line number ranges for the citations to the applied art. Appellants respectfully submit that the additional citations in the Answer still do not establish that the applied art discloses or suggests each of the elements, features, and relationships recited in the claims.

In addition, on page 7 of the Examiner's Answer, there is a section labeled "**(10) Response to Arguments**" which presents additional arguments and clarifications in response to Appellants Appeal Brief. Appellants respectfully submit that these additional arguments do not rebut the numerous deficiencies in the rejections pointed out in Appellants' Appeal Brief. The Office has again failed to establish where each of the recited elements, features, and relationships pointed out in the Appeal Brief as missing in the applied art are found in the prior art. Therefore, all of the rejections of claims 5-11 should be reversed.

### **Claim 5**

With respect to independent claim 5, the Answer (at Page 5, lines 10-18 and Page 7, lines 7-20) appears to assert that: Column 23, lines 15-65; Column 25, lines 12-65; Column 26, lines 31-49; Column 27, lines 39-42; and Figures 9-10 of Schneider, show a web-based GUI that provides the user or administrator the ability to modify access policies.

Appellants disagree. Nowhere do these referenced portions of Schneider disclose or suggest a web-based GUI that enables a user or administrator to define access policies. For example, with respect to claim 5, nowhere in these referenced portions or any other portion of Schneider, does Schneider disclose or suggest both:

**a policy builder component . . . for defining access policies**

**AND**

**a web-based delegated administration component . . . for defining access policies**

Nowhere does Schneider disclose or suggest that its described system includes both of these elements. At most one of Schneider's non-web-based administrative displays (e.g., display 1101) could arguably correspond to the recited "a policy builder component available to one or more policy managers, for defining access policies for the computer network users, services and resources." However, nowhere does Schneider disclose or suggest that such non-web-based administrative displays are ever web-based. Thus the non-web-based administrative displays shown in Schneider do not disclose or suggest the recited element of "a web-based delegated administration component accessible to users for defining access policies for the computer network users, services and resources."

In addition, the IntraMap interface display (1801) discussed in Schneider and referenced in the Answer also does not correspond to the recited web-based delegated administration component. Schneider does not disclose or suggest that the described IntraMap is capable of **defining access policies**. Rather the IntraMap is used to show users a listing of resources defined by the access policies (Column 25, lines 16-19). Nowhere does Schneider disclose or suggest that the described IntraMap allows users to define access policies.

In addition, the Answer (at Page 7, lines 20-21) asserts that the web-based component "utilizes Policy Tables" at Column 31, lines 17-67 and Figure 16 of Schneider. However, it is not clear from the Answer why this referenced portion of Schneider is relevant to claim 5. This portion of Schneider discusses the structure of the access control database (301) shown in Figure 16 that is used to store access policies, administrative policies, and policy maker policies (Column 31, lines 18-21) for the access control database (301). However, only the non-web based administrative displays (Figures 8-12) of Schneider are described as being capable of

defining such policies in the access control database (301) (e.g., Column 24, line 31-33). The alleged use of such a database does not provide any evidence that the IntraMap or any other web based component uses this database to define access policies. Rather since the IntraMap is designed to display information associated with policies, the database (301) appears to be used by the IntraMap to acquire the information that the IntraMap displays (Column 27, lines 12-16). Nowhere does Schneider disclose or suggest a web-based component that defines access policies in the database (301).

The Answer (at Page 8, lines 1-17) also references Column 26, lines 31-49 and Column 27, lines 16-25 with respect to defining access policies. However, none of these portions of Schneider discloses or suggests that the IntraMap or any other web-based component is used to define access policies. The mere teaching in these portions of Schneider that the IntraMap itself may be referenced by access policies, does not disclose or suggest that the IntraMap is capable of defining access policies.

The Answer (at Page 8, line 18 to Page 9, line 10) additionally references Column 27, line 43 to Column 28, line 6 and Figure 25 with respect to defining access policies. However this portion of Schneider does not disclose or suggest that the IntraMap or any other web-based component is used to define access policies. Rather this portion of Schneider teaches away from using the IntraMap to define access policies by teaching that the user of the IntraMap must e-mail an administrator to request access to a resource. Thus it is clear that the IntraMap does not have any functionality that would enable it to define access policies.

The Answer (at Page 9, lines 12-15) also references Figures 9-25 and states that a VPN is routinely used to connect users over the Internet. However, nowhere do Figures 9-25 show a



web-based component that is used to define access policies. Further, the ability of VPN to connect users over the Internet does not disclose or suggest the ability of a web-based component to define access policies.

The Answer (at Page 9, line 16 to Page 10, line 2) also states that Figures 9 through 12 of Schneider explain the feature on the IntraMap where a user can request information about new resources available and that e-mail is just one option available. Appellants disagree. Figures 9-12 do not show the IntraMap. Nor do Figures 9-12 show web-based components. Rather Figures 9-12 are directed to non-web based components. The IntraMap (1801) is shown in Figures 18 and 24. Thus Figures 9-12 do not disclose or suggest a web-based delegated administration component for defining access policies.

For these additional reasons, Appellants respectfully submit that the 35 U.S.C. § 102 (e) rejection of claim 5 should be reversed.

#### **Claim 6**

With respect to claim 6, the Answer (at Page 5, lines 19-22 and Page 10, lines 3-7) appears to assert that Column 26, lines 8-15 of Schneider shows that a service type control can be another filter the user applies to a Resource List. However, this referenced portion of Schneider states nothing about web-based delegated administration components or any other components that are implemented as services. Rather this portion of Schneider is directed to using check boxes to filter what services are shown in a Resources list. Nowhere does Schneider disclose or suggest a web-based delegated administration component that is implemented as a service supported by the computer security service.

For these additional reasons, Appellants respectfully submit that the 35 U.S.C. § 102 (e) rejection of claim 6 should be reversed.

#### **Claim 7**

With respect to claim 7, the Answer (at Page 6, lines 1-4 and Page 10, lines 8-13) appears to assert that Schneider teaches a Java applet with all of the limitations of claim 5 running on the world-wide-web browser which is equivalent to HTML format pages. However, as discussed previously Schneider does not disclose or suggest a web-based applet or any other web-based component for defining access policies. Thus Schneider does not disclose or suggest a delegated administration component for defining access policies, which component is comprised of one or more HTML format pages accessible to users.

For these additional reasons, Appellants respectfully submit that the 35 U.S.C. § 102 (e) rejection of claim 7 should be reversed.

#### **Claim 8**

With respect to claim 8, the Answer (at Page 6, lines 5-10 and Page 10, lines 14-22) appears to assert that Column 27, line 43 to Column 28, line 6 and Column 31 line 17 to Column 32, line 8 of Schneider shows how users can be administrators of policies. However, regardless of whether Schneider teaches that users can be administrators, Schneider does not disclose or suggest a delegated administration definition component which selectively enables users to use a web-based delegated administration component to define access policies. For these additional

reasons, Appellants respectfully submit that the 35 U.S.C. § 102 (e) rejection of claim 8 should be reversed.

### **Claim 9**

With respect to claim 9, the Answer references: a GUI having an x and y axis; Column 31, lines 17-32; Column 22, lines 47-67; and Figures 9-18 of Schneider. However, these referenced portions of Schneider do not show the features and relationships recited in claim 9. For example, nowhere do these portions of Schneider disclose or suggest a graphical user interface for displaying a grid having nodes, laid out on a first axis defining users and a second axis defining resources, which nodes corresponds to a variable set of users for which delegated administration permissions are granted. In addition, nowhere do these referenced portions of Schneider disclose or suggest that the position of each node relative to the first and second axis in the grid define the users and the resources, respectively, for which permissions are granted for the node. For these additional reasons, Appellants respectfully submit that the 35 U.S.C. § 102 (e) rejection of claim 9 should be reversed.

### **Claim 10**

With respect to claim 10, the Answer references graphs or table entry sheets in Microsoft Excel or Access; Column 31, lines 17-32 of Schneider; and Figures 9-10 of Schneider. However, these references to Microsoft applications and Schneider do not show the features recited in claim 10. For example, nowhere has the Office shown where Schneider or any other applied prior art, shows a graphical user interface comprised of an array of nodes which define specified

users enabled to modify user data maintained by the computer security service, where the array of nodes is relative to the second axis defining resources and where the position of each node in the array of nodes, relative to the first axis defining users, defines the user data for which the modification of data is enabled. For these additional reasons, Appellants respectfully submit that the 35 U.S.C. § 102 (e) rejection of claim 10 should be reversed.

## **CONCLUSION**

Each of Appellants' pending claims specifically recites elements, features, relationships, and steps that are neither disclosed nor suggested in any of the applied prior art. Furthermore, the applied prior art is devoid of any teaching, suggestion, or motivation for producing the recited invention. For these reasons, it is respectfully submitted that all of the rejections should be reversed.

Respectfully submitted,

/Christopher L. Parmelee/

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